Exhibit 13

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

CHMURA ECONOMICS & ANALYTICS, LLC,	}
Plaintiff,) Case No. 3:19-cv-813-REP
v.	\
RICHARD LOMBARDO,	\(\)
Defendant.	;

DECLARATION OF GREG CHMURA

- I, Greg Chmura, hereby declare under penalty of perjury as follows:
- I am over the age of 18, and all of the facts in this declaration are within my personal knowledge.
- 2. I am the Chief Quality Officer of Chmura Economics & Analytics, LLC (the "Chmura Economics"). I have held the position of Chief Quality Officer since approximately October 2016. Before becoming Chief Quality Officer, I served as Chmura Economics' Director of Data Governance, as well as holding other titles and wearing many hats with the company going back to 2005. I also am a minority owner of Chmura Economics and serve in a leadership role.
- 3. I also held the appended title of "Vice President of Sales" from approximately September 2017 to November 2018 as well as February 2019 to March 2019, and again from July 2019 to December 2019. During those first two time periods, spanning 17 months, all sales staff reported directly to me and I oversaw all sales functions; during the last stint of approximately six months, the Sales Manager Eli Auerbach reported to me. Before overseeing

the Sales department, my role in Data Governance and in supporting product development involved a good deal of ongoing interaction with the sales team.

- 4. In my various roles over the past several years, I have relied heavily on the experience and opinions of Senior Account Managers, including, in particular, Richard Lombardo, to develop and implement strategies to make Chmura successful.
- 5. Since at least 2016, Chmura's Account Managers have had discretion to offer discounts of up to ten percent (10%) to customers and prospective customers on Chmura's subscription labor data platform, JobsEQ. Chmura, however, valued Lombardo's sales judgment so highly that in November 2018, I notified Mr. Lombardo that he could offer discounts of up to thirty percent (30%) without approval.
- 6. Mr. Lombardo also had the ability to recommend discounts above 30%. When Mr. Lombardo believed that he needed to offer a discount above his discretionary amount, he would meet with me (or with his Sales Manager) and provide a business justification for his proposed pricing. In my experience, Mr. Lombardo typically came to these meetings with a firm idea of what it would take to close a deal, based on his knowledge of the industry and the client's financial situation.
- 7. Given Mr. Lombardo's experience and the sales he brought to the company, I valued his opinions and gave considerable weight to his recommendations. I usually agreed with Mr. Lombardo's pricing recommendations and approved them myself or advocated for them in consultation with Leslie Peterson, to whom I reported.
- I also relied heavily on Mr. Lombardo when evaluating Chmura's overall market and sales strategies. Specifically, I often depended on Mr. Lombardo's input and advice when

examining which customers and industries to target, which conferences to attend, and which internal staffing arrangements may be beneficial for Chmura.

- 9. Additionally, Mr. Lombardo frequently made recommendations for features to include in JobsEQ to ensure that Chmura Economics could remain competitive in its marketplace. I considered and valued Mr. Lombardo's recommendations because he knew what features were important for Chmura Economics' customers and prospective customers.
- 10. For example, Chmura has a product called Career Concourse, which is a tool to help people explore career options by finding matches with their interests, skill set, and aptitude. Chmura, however, had some difficulty making headway in the educational market. Mr. Lombardo learned that customers in that market were using a similar tool from a competitor and he advised us that, to be more competitive, Chmura needed to update its Career Concourse tool. We agreed with Mr. Lombardo's recommendation. As a result, Chmura completely overhauled its Career Concourse tool.
- 11. Similarly, Mr. Lombardo informed me on numerous occasions that it was critical for JobsEQ to contain Gross Domestic Product (GDP) data. Mr. Lombardo stated that customers were frequently asking for these data. Due in part to Mr. Lombardo's requests, Chmura ultimately updated its JobsEQ software to include these data, a project taking over six months to complete.
- 12. Mr. Lombardo also brought to my attention the importance of adding firm list data into JobsEQ. He recommended that Chmura add this dataset. We again agreed with Mr. Lombardo's recommendation, and Chmura added that capability in January 2019, purchasing these data from a third-party vendor to do so.

- 13. On multiple occasions Mr. Lombardo brought to Chmura's attention that we needed to improve the image exports of tables within JobsEQ, and that this feature would be highly desired by Chmura clients. Based on this recommendation, Chmura upgraded this feature.
- 14. Mr. Lombardo also recommended to me that we adjust Chmura's pricing matrix to have a more accommodating price point for local agencies such as economic developers for national-data licenses. I agreed with his assessment, advocated for the change, and it was implemented in January 2019.
- 15. Client care was a part of Mr. Lombardo's job that he performed notably well. He managed most aspects of Chmura's relationships with his customers, including by coordinating follow-up with me and with other members of Chmura's team as needed based on the clients' requests.
- 16. My office was right next to the CTO's office. Mr. Lombardo was in one of our offices so often, advocating for one of his clients, that it became a running joke among the three of us.
- 17. As time went on at Chmura, Mr. Lombardo spent more and more of his time in service of his client accounts, in contrast to new sales. In my estimation, the time spent supporting current clients grew to approximately 50% of his work activities.
- 18. In all my time at Chmura of directly supervising Mr. Lombardo or otherwise interacting with him, he never once mentioned to me that he believed he should be paid overtime.
- I considered Mr. Lombardo a trusted advisor and placed a high value on his judgment, opinions, and recommendations for Chmura's business.

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Dated this _14th_ day of May, 2020.

Greg Chmura